

Joint Status Report Pursuant to Rule 26(f)

Caption: J Dog Franchises v. Louis Vaughn

Civil Action No: 2-15-cv-02780

Basis of Jurisdiction: Federal Question and Diversity

Jury Trial: X Non-Jury Trial: Arbitration:

Plaintiff's counsel participating in the Rule 16 Conference: **Samuel Halterman**

Defendants counsel participating in the Rule 16 Conference: **Frank Mazzeo**

Do counsel have full authority to settle at Rule 16 Conference? No

If not, client with such authority who will attend conference:

Defendant is in Texas and will be available by phone

Chris Debbas will be present and has settlement authority on behalf of Plaintiff.

When did the parties hold the Rule 26 Conference? August 5, 2015

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure? pending

Does either side expect to file a case-dispositive motion? Yes both Parties (yes/no)

If yes, under what Rule Rule 56

If yes, specify the issue Plaintiff expects to file on all issues. Defendant on issues in complaint

Proposed deadline for filing dispositive motions: 30 days after discovery

Does either side anticipate the use of experts? no

If yes, what is the proposed deadline for expert discovery?

Approximate date case should be trial-ready:

Time for Plaintiff's case: 1 day Time for Defendant's case:

Is a settlement conference likely to be helpful? No If so, when:

Early (yes/no) After Discovery (yes/no)

What is the outcome of your discussions with your clients about proceeding before a Magistrate Judge for final disposition?

Plan for Discovery:

1. The parties anticipate that discovery should be completed within **90** days.
2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? 0 Days.
3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? Yes.
4. Identify any other discovery issues, which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan.
none
5. If you contend the discovery period to exceed 90 days, please state reason:

Signatures:

/Samuel Halterman/
Attorney for Plaintiff

/Frank Mazzeo/
Attorney for Defendant